

# TECHNICAL MEMORANDUM



Date: April 12, 2021

To: Meredith Penny; Grant Johnson; Jonathan Lange

From: Mark Daniel, AICP; Dan Nickel

Project Name: Island County SMP Periodic Review

Watershed Project Number: 190534

## Subject: SMP Wetland Provisions

Island County is currently in the process of conducting the Periodic Review of its Shoreline Master Program (SMP). To address wetlands in shoreline jurisdiction, the existing SMP incorporates by reference certain provisions from the critical areas regulations in ICC Chapter 17.02A.

The County's most recent critical areas regulations are contained in ICC 17.02B. Similar to the existing SMP, the proposed draft SMP for the public comment period (dated March 26, 2021) incorporates by reference provisions from seven sections of ICC 17.02B.

As part of the Periodic Review, the County is considering addressing wetlands in shoreline jurisdiction by including the necessary provisions within the SMP itself. How various provisions from the seven sections of ICC 17.02B might be integrated into the SMP is outlined in the table below.

**Table 1. Integration of ICC 17.02B provisions into SMP**

Section of ICC 17.02B	SMP Integration
<b>General Provisions</b>	
17.02B.060 - Definitions.	Integrate individual definitions into SMP when a term is used in SMP provisions. For any definitions integrated into the SMP, ensure that the SMP does not already contain similar definitions.
17.02B.080 - General mitigation requirements.	Provisions generally appear appropriate for integration into SMP if content is not already covered by provisions in the SMP. It is likely that the content of these provisions is already covered by provisions in the SMP.

Section of ICC 17.02B	SMP Integration
<b><i>Designation, Classification and Mapping</i></b>	
17.02B.240 - Wetlands.	
A. Designation criteria.	Provisions do not appear appropriate for integration into SMP. Provisions appear inconsistent with Shoreline Management Act (SMA) and/or SMP Guidelines. Designation criteria that are consistent with SMA/SMP Guidelines should be added to SMP.
B. Mapping.	Provisions generally appear appropriate for integration into SMP. Minor amendments may be needed for integration (e.g. citations).
C. Wetland identification.	Provisions generally appear appropriate for integration into SMP. Minor amendments may be needed for integration (e.g. content related to exempt activities, development, and uses).
<b><i>Evaluation and Protection Standards</i></b>	
17.02B.410 (A-D) - General standards.	Provisions generally appear appropriate for integration into SMP if content is not already covered by provisions in the SMP.
17.02B.460 - Wetlands.	
A. Land use intensity.	Provisions generally appear appropriate for integration into SMP.
B. Wetland classification system.	Provisions generally appear appropriate for integration into SMP.
C. Wetland buffers.	Provisions generally appear appropriate for integration into SMP. Minor amendments may be needed for integration (e.g. citations).
D. Wetland buffer modification.	Provisions generally appear appropriate for integration into SMP. Some amendments may be needed for integration (e.g. buffer reduction limited to 75 percent of originally required buffer).
<b><i>Mitigation Requirements</i></b>	
17.02B.500 - Requirements	Provisions generally appear appropriate for integration into SMP if content is not already covered by provisions in the SMP. Note that content of this section addresses mitigation for critical areas other than wetlands (including priority habitats and species). Minor amendments may be needed for integration.

Section of ICC 17.02B	SMP Integration
17.02B.510 - Wetlands.	
A. Wetland mitigation standards.	Provisions generally appear appropriate for integration into SMP. Minor amendments may be needed for integration (e.g. citations).
B. Wetland mitigation ratios.	Provisions generally appear appropriate for integration into SMP. Minor amendments may be needed for integration (e.g. citations).
C. Wetland mitigation plan.	Provisions generally appear appropriate for integration into SMP.
D. Off-site mitigation.	Provisions generally appear appropriate for integration into SMP. Requirement for mitigation to provide no net loss of shoreline ecological functions should be added to SMP.
E. [No header].	Provisions generally appear appropriate for integration into SMP. Note that such a program would need to be designed to provide mitigation for impacts to shoreline ecological functions.
F. Wetland mitigation banks.	Provisions generally appear appropriate for integration into SMP.